

# Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JARROD STRINGER, et al.,	*	
Plaintiffs,	*	
	*	
v.	*	No. SA-20-CV-46-OG
	*	
RUTH R. HUGHS, et al.,	*	
Defendants.	*	

VIDEOCONFERENCED DEPOSITION OF  
THE CORPORATE REPRESENTATIVE OF  
THE TEXAS DEMOCRATIC PARTY,

TOMMY GLEN MAXEY

Monday, April 27, 2020

VIDEOCONFERENCED DEPOSITION OF TOMMY GLEN  
MAXEY, produced as a witness at the instance of the  
Defendants, and duly sworn, was taken in the  
above-styled and numbered cause on Monday, April 27,  
2020, from 10:03 a.m. to 2:04 p.m., before Debbie D.  
Cunningham, CSR, in and for the State of Texas, remotely  
reported via Machine Shorthand, pursuant to the Federal  
Rules of Civil Procedure.

--ooOoo--

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2 Q. (BY MS. MACKIN) Okay. And so I'm trying to  
3 get a list of the main activities of the Texas  
4 Democratic Party. And so based on what you've said, it  
5 sounds like there is fundraising. There is candidate  
6 services. There is county services, voter protection,  
7 voter expansion, and maybe organizing. I mean, if you  
8 had to break it down into categories of activity, how  
9 would you do that, because I appreciate the explanation  
10 of kind of the departments and the structure?

11 A. Every day we communicate with voters. We  
12 educate voters. We help Texans who are not registered  
13 get them registered in myriads of ways to make sure that  
14 we expand the voting pool. We educate them how to cast  
15 a vote, when to cast a vote, where to cast a vote, and  
16 who to cast a vote for, pure and simple.

17 Our main goal right now is to register  
18 approximately 2.6 million people to vote, which we're  
19 spending lots of money on doing because the State of  
20 Texas is not following the federal law in registering  
21 people when they change their driver's license.  
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Q. No, no, no, no. I'm talking about the link on the Secretary of State's website where one can request that a postage-paid application be mailed --

A. A, have the computer to do that. But when you get there, you can ask them, yes, to send you a form. It is a laborious process. It takes a week or more for people to get that piece of paper. Then they have to fill it out and mail it in.

Often, we -- most people register -- I mean, a considerable amount of people register in the last weeks before the registration deadline. And asking the Secretary of State to send a blank piece of paper to you for you to fill out and then send back in, to get it in before that deadline often causes, let's say, tens of

1 thousands of people not to make the deadline.

2 So we make a decision of sending a  
3 registration card in August to people that we know are  
4 not registered to vote already, for them to have  
5 convenience to fill it out. That's what you call "how  
6 you win an election." We don't wait for people to  
7 figure it out. We make it available to them so that  
8 they can take advantage of it by just filling in their  
9 personal data, signing it, putting it in a postage-paid  
10 envelope coming with the application.

11 In other words, we're not waiting for  
12 people to ask. We are sending people who are unaware  
13 that they need to register to vote because they have not  
14 been educated. Remember that voter education project?  
15 "Hey, you have to get on a registration list. We're not  
16 a state with automatic voter registration. I'm sure you  
17 vote -- you moved here from Washington, but you're not  
18 going to automatically be on the voter registration  
19 roles. So you need to fill out a piece of paper."

20 That's why we mail it to them and not  
21 just wait for people. If we waited for people, then the  
22 voter registration would be sorely lacking in Texas.

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Q. About how long does that process take? Like,  
if I went on RegisterTexas.com and filled it out, how

1 long, approximately, would it be until I got my  
2 application in the mail to sign and then forward along  
3 in the postage-paid envelope?  
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6 Q. Okay.

7 A. And most of this we wouldn't have to do if  
8 people could update their registration when people got  
9 their driver's license updated.  
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Q. (BY MS. MACKIN) And who are TDP's members?

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7       A.    The Texas Election Code states that members of  
8 a political party are the voters who cast a ballot in  
9 their primary election or sign an Affidavit of  
10 Affiliation with a Party -- it's spelled out in the  
11 Election Code -- with a Party officer. And so our  
12 members, in a legal sense, are approximately 2,084,000  
13 Texans who voted in the March 3rd Democratic primary.  
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